

# **EXHIBIT 45**

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
-----X  
MARK I. SOKOLOW, et al.,  
  
PLAINTIFFS,  
  
-against- Case No:  
04CV397 (GBD) (RLE)  
  
THE PALESTINE LIBERATION ORGANIZATION, et  
al.,  
  
DEFENDANTS.  
-----X

DATE: July 9, 2012  
TIME: 3:05 P.M.

DEPOSITION of SHAUN CHOFFEL,  
taken by the Defendants, pursuant to Notice  
and to the Federal Rules of Civil  
Procedure, held at the offices of Morrison  
& Foerster, 1290 Avenue of the Americas,  
New York, New York 10104, before Robert X.  
Shaw, CSR, a Notary Public of the State of  
New York.

1 Shaun Choffel

2 MR. SOLOMON: So, I'll make an  
3 objection and ask you to clarify the  
4 question for me.

5 MR. HILL: Let me ask the  
6 question again.

7 Q. Are you saying that you think  
8 that your sister's conversion to Judaism  
9 had nothing to do with her decision to cut  
10 off contact with your family?

11 A. I don't believe that the two  
12 were the same.

13 Q. Okay. Do you believe that  
14 they're even related?

15 A. That's possible.

16 Q. Okay. What's the other  
17 possibility? Can you think of any other  
18 reason why your sister decided to not  
19 communicate with you and your parents?

20 A. I have no idea.

21 Q. Okay. And neither you nor your  
22 parents had any communication with her  
23 between May of 1990 and 2002; is that  
24 right?

25 A. Correct.

1 Shaun Choffel

2 A. No.

3 Q. You were not present when your  
4 sister was killed?

5 A. No.

6 Q. You have not seen her body?

7 MR. SOLOMON: Objection.

8 You can answer.

9 A. No.

10 MR. SOLOMON: Let's take a  
11 break.

12 Can you come outside for a  
13 second?

14 (Whereupon, a short recess was  
15 taken.)

16 MR. HILL: Back on the record.

17 Q. Is it fair to say that you and  
18 your sister were not close at the time of  
19 her death?

20 MR. SOLOMON: Objection.

21 A. Yes.

22 Q. Your sister did not attend your  
23 wedding?

24 A. No.

25 Q. Your sister has never met your

1 Shaun Choffel

2 later captured by the Israelis, the family  
3 could collect.

4 Q. And what does any of that have  
5 to do with your sister's death?

6 A. It seems to me it was an  
7 incentive program.

8 Q. Okay. And have you seen any  
9 documents, or anything other than this NBC  
10 broadcast that evidences what you just  
11 described?

12 MR. SOLOMON: Objection.

13 A. I don't -- no.

14 Q. You, personally, don't have any  
15 evidence of what you just described?

16 A. No.

17 Q. This is something that Mr.  
18 Leitner has told you about?

19 MR. SOLOMON: Objection.

20 A. Yes.

21 Q. All right. Are you aware of  
22 any evidence that the PA had anything to do  
23 with your sister's death?

24 A. No.

25 Q. Are you aware of any evidence

1 Shaun Choffel

2 that the PLO had anything to do with your  
3 sister's death?

4 A. Say that again, please.

5 Q. Are you aware of any evidence  
6 that the PLO had anything to do with your  
7 sister's death?

8 A. No.

9 Q. At the time of your sister's  
10 death, do you know if she was earning a  
11 living?

12 A. Yes.

13 Q. Okay. How do you know that?

14 A. Either my mother or my father  
15 told me.

16 Q. And how did they know that?

17 MR. SOLOMON: Objection.

18 You can answer.

19 A. The -- I think his name is Dr.  
20 Scheaffer. I don't know if he was her  
21 boss, and I believe my father spoke with  
22 him.

23 Q. Do you know how you spell Dr.  
24 Scheaffer's name?

25 A. S-H -- I'm sorry,

1 Shaun Choffel

2 anything to do with her decision to stop  
3 communicating?

4 A. No.

5 Q. Was she dating anyone else at  
6 the time that she stopped communicating  
7 with you?

8 A. Not that I knew of.

9 Q. You mentioned that she and Ohad  
10 eventually broke up?

11 A. Yes.

12 Q. Do you know, was that her  
13 initiative, or his initiative?

14 A. I don't know. She was in  
15 Israel.

16 Q. She was in Israel when they  
17 broke up?

18 A. Yes.

19 Q. So, they were together at the  
20 time that she went to Israel in 1990?

21 A. Yes.

22 Q. Do you know if they lived  
23 together while they were in Israel?

24 A. I don't have any knowledge of  
25 that.